

Filed Electronically

Cisco Systems, Inc.
601 Pennsylvania Ave. NW
Washington, D.C. 20004
April 2, 2004

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Comment; WT Docket No. 02-146; Proposals to Develop and Manage Independent Database of Site Registrations by Licensees in the 71-76 GHz, 81-86 GHz and 92-95 GHz Bands

Dear Ms. Dortch:

On March 12, 2004, the Wireless Telecommunications Bureau issued a Public Notice in the above-captioned docket, announcing both a filing schedule for proposals from commercial entities interested in developing and managing an independent database of site/link registrations in the millimeter wave bands, and announcing an opportunity to comment on those proposals. Public Notice, *Wireless Telecommunications Bureau Opens Filing Window for Proposals to Develop and Manage Independent Database of Site Registrations By Licensees in the 71-76 GHz, 81-86 GHz and 92-95 GHz Bands*, DA 04-672, March 12, 2004. Four parties submitted proposals: Comsearch, NECA Services, Inc., Frequency Finder, Inc. and Micronet Communications, Inc. Cisco Systems, Inc. ("Cisco") hereby submits a brief comment directed to the merits of your evaluation.

Cisco is pleased that the Bureau is moving forward promptly to select an entity or entities to manage the independent database of site/link registrations for this band. Pending before the Commission in this docket is a Petition for Reconsideration from the Wireless Communications Association International, Inc. suggesting rule revisions that would require interference analysis at the time a user registers. Cisco urges the Bureau to ensure that any entities selected as a database manager agree to support not only the current rules as adopted in the Report and Order, but also the pending proposed modification requiring up-front interference analysis. Cisco notes that the Comsearch and Micronet proposals specifically provide for interference analysis as part of the registration process, which the applicants propose will be offered on an optional basis under the current rules.

Finally, entities registering links need certainty. As you evaluate the various proposals, Cisco urges you to consider how promptly the eligible parties can provide a response to the registering party. Successful implementation of the Commission's

policies for this band depends in large measure on a prompt registration process that does not result in undue delay in the construction of links. In our view, the entity who is registering a link needs a result within one week after the filing with the administrator.

Sincerely,

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